

### **REMARKS**

Applicant appreciates the Examiner's thorough consideration provided the present application. Claims 1-15 and 17-21 are now present in the application. The specification, abstract, and claims have been amended. Claims 17-21 have been added. Claim 16 has been cancelled. Claims 1, 10 and 12 are independent. Reconsideration of this application, as amended, is respectfully requested.

### **Drawings**

Applicant thanks the Examiner for accepting the formal drawings of the instant application.

### **Specification**

The specification and the abstract have been amended to correct typographical and grammatical errors. Applicant respectfully submits that no new matter is entered. Entry of the above amendments to the specification and abstract is earnestly solicited.

### **Claim Objections**

Claim 16 has been objected to due to the presence of minor informalities. Claim 16 has been cancelled to expedite the prosecution. Accordingly, this objection has been

obviated and/or rendered moot. Reconsideration and withdrawal of this objection are respectfully requested.

### **Claim Rejections Under 35 U.S.C. §§ 102 & 103**

Claims 1-10 and 12-16 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Humpleman et al., U.S. Patent No. 6,198,479 (hereinafter referred to as "Humpleman"). Claim 11 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Humpleman in view of Gupta et al., U.S. Patent No. 5,864,542 (hereinafter referred to as "Gupta"). These rejections are respectfully traversed.

Complete discussions of the Examiner's rejections are set forth in the Office Action, and are not being repeated here.

Independent claim 1 recites a combination of elements including "a first server connected to a non-IP based network" and "a second server connected to a non-IP based network and an IP based network".

Independent claim 10 recites a combination of steps including "a non-IP based network receives an Internet service request from the Internet" and "the non-IP based network provides the Internet service corresponding to the received Internet service request to the Internet".

Independent claim 12 recites a combination of elements including "a first appliance for controlling and communicating the non-IP based network with the

Internet” and “a second appliance which is connected with the first appliance for providing the Internet service to a third appliance connected with the Internet via the first appliance when the Internet service is requested by the third appliance connected to the Internet via the first appliance”.

Applicant respectfully submits that the combinations of elements and steps set forth in claims 1, 10 and 12 are not disclosed or suggested by the references relied on by the Examiner.

Humpleman discloses, as shown in Fig. 14, a plurality of home devices in an *Internet protocol (IP) compatible home network* 1110 connected by an IEEE 1394 serial bus 114, and an Internet proxy 1104 used to provide an interface between the home network 1100 and the Internet 1102 (see FIG. 14; col. 20, lines 43-57). Humpleman also discloses that the IEEE 1394 serial bus 114 supports standard IP communication (see col. 4, lines 36-38). Humpleman further discloses that communication on the home network is provided through the use of the TCP/IP standard network protocols and that each home device is associated with a unique IP address (see col. 10, lines 45-52). In other words, the home network 1110 is an *IP-based network*.

The Examiner alleged that Humpleman discloses that other communication protocols such as Function Control Protocol (FCP) could be used to provide communication for a home network 100 in FIG. 1. However, the home network 100 shown in FIG. 1 is simply an *internal network*; i.e., an *intranet*. The home network 100

shown in FIG. 1 is not connected to the *Internet*. Humpleman nowhere teaches how the home devices in such a non-IP-based home network 100 can be accessed through the *Internet*. In other words, Humpleman's use of FCP is limited to the intranet environment of Fig. 1, and does not teach applying it to the structure shown in FIG. 14 of Humpleman, which is an *IP-based network*.

In fact, Humpleman proposes using the IP standard for the network layer 160 in its home network 100. For example, Humpleman discloses that by employing the IP standard for the network layer 160, the home devices can communicate with each other without having to know specific details about the other communication layers shown in FIG. 2 (see col. 4, lines 54-59). Further, Humpleman nowhere discloses how to deal with the problems regarding the necessity and complexity for the home devices in a non-IP-based network to know the specific details about the other communication layers when communicating with the other devices on the Internet, which is not an issue when using the IP standard for the network layer 160 as suggested by Humpleman.

In addition, Humpleman also discloses "[a]s depicted in FIG. 14, in certain *embodiments* an Internet proxy 1104 is used to provide an interface between the home network 1100 and the Internet 1102" because the home network is an *Internet protocol compatible home network* (see col. 20, lines 43-44, 53-55). Since the non-IP-based network is not an IP compatible network, the embodiment shown in FIG. 14 is not applicable to the non-IP-based network.

Accordingly, since the embodiment shown in FIG. 14 is an IP-based network and Humpleman fails to teach how a non-IP-based network concept can be applied to the IP-based network in FIG. 14, Humpleman fail to teach the above combinations of elements and steps set forth in claims 1, 10 and 12, in which the servers/appliances are in a non-IP-based network and are able to be accessed through the Internet.

With regard to the Examiner's reliance on Gupta, this reference has only been relied on for its teachings related to dependent claim 11. This reference also fails to disclose the above combinations of elements and steps as set forth in independent claims 1, 10 and 12. Accordingly, Gupta fails to cure the deficiencies of Humpleman.

Accordingly, neither Humpleman nor Gupta individually or in combination teaches or suggests at least the above-noted features of independent claims 1, 10 and 12. Therefore, Applicant respectfully submits that independent claims 1, 10 and 12 and their dependent claims (due to their dependency) clearly define over the teachings of Humpleman and Gupta. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. §§ 103 are respectfully requested.

#### **Additional Claims**

Additional claims 17-21 have been added for the Examiner's consideration.

Applicant respectfully submits that claims 17-21 are allowable due to their respective dependence on independent claim 1, as well as due to the additional recitations included in these claims.

Favorable consideration and allowance of additional claims 17-21 are respectfully requested.

#### **Additional Cited References**

Since the remaining patents cited by the Examiner have not been utilized to reject the claims, but rather to merely show the state of the art, no further comments are necessary with respect thereto.

#### **CONCLUSION**

All the stated grounds of rejection have been properly traversed and/or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently pending rejections and that they be withdrawn.

It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

In the event there are any matters remaining in this application, the Examiner is invited to contact the undersigned at (703) 205-8000 in the Washington, D.C. area.

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If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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